

EXHIBIT 19

REDACTED

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,)
Plaintiff,)
vs.) Case No.
UBER TECHNOLOGIES, INC.;) 3:17-CV-00939-WHA
OTTOMOTTO LLC; OTTO TRUCKING)
LLC,)
Defendants.)
_____)

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

OTTO TRUCKING LLC'S VIDEOTAPED 30(b)(6) DEPOSITION OF
PIERRE-YVES DROZ
Palo Alto, California
Tuesday, August 22, 2017
Volume I

Reported by:
CATHERINE A. RYAN
CMR, CRR, CSR No. 8239
Job No. 2685937

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1 desk, but -- 14:47:39

2 Q And what -- what device was on her desk?

3 A A PBR5.

4 Q Is PBR5 in use today?

5 A No. 14:47:50

6 Q Why not?

7 A It was --

8 MR. JAFFE: Object to form --

9 THE WITNESS: Sorry.

10 MR. JAFFE: -- and outside the scope. 14:47:53

11 THE WITNESS: PBR5 is the much earlier

12 version to the PBR we use today. It's a very

13 different -- very different capabilities, very

14 different technology, and I think we -- we stopped

15 using it probably, like, three years ago-ish. 14:48:08

16 Something like that.

17 MR. CHATTERJEE: I'm going to mark this as

18 1826.

19 (Exhibit 1826 was marked for

20 identification by the court reporter.) 14:48:32

21 BY MR. CHATTERJEE:

22 Q I've marked the document as 1826. I'm

23 going to give you the physical specimens in a

24 minute. I just want to have a record of what it is

25 I'm giving you. These are pictures of each side of 14:48:44

1 the device that I'm giving you. 14:48:46

2 A Okay.

3 Q I'm going to hand you the device here, and

4 you can open the bag and take it out.

5 A Yeah. 14:48:54

6 Q Do you recognize these devices, Mr. Droz?

7 A Let me look at the identification number

8 on it.

9 Q I can give you a magnifying glass if it

10 would be helpful. 14:49:12

11 MR. JAFFE: Has this been made available

12 in discovery?

13 MR. CHATTERJEE: It is now.

14 MR. JAFFE: You're just making available

15 that you had devices in discovery? 14:49:17

16 MR. CHATTERJEE: I just got them.

17 MR. JAFFE: From where?

18 MR. CHATTERJEE: Yesterday. You'll find

19 out soon enough.

20 Q Go ahead, Mr. Droz. 14:49:23

21 A Okay. So -- sorry. What is your

22 question?

23 Q Do you recognize these documents?

24 A I mean, documents, no, but the boards,

25 yes. 14:49:38

1 Q Okay. What are those boards? 14:49:38

2 A Those boards are early version of the GBr2

3 transmit boards.

4 Q Okay. If you would look -- you can use

5 the magnifying glass if it would be helpful. It's 14:49:47

6 [REDACTED]

7 Do you see that?

8 A Yes, that would be two versions of it.

9 Q Now, there's something attached to the

10 side of those. Do you see those? Do you know what 14:50:04

11 those are?

12 A They look like ear- -- like -- I don't

13 know. I think they look like ear- -- how do you

14 call it? Like, earring rings.

15 Q Are you familiar with anyone giving 14:50:16

16 earrings -- giving the printed circuit boards as

17 earrings to someone as a gift?

18 A No, I'm not.

19 Q Okay. And so you're not familiar with

20 Seval Oz? 14:50:26

21 A I'm sorry. I'm familiar with her, but her

22 having that, I'm totally not familiar with it.

23 Q So you were not at a -- at a party where

24 they gave these to her as a gift when she left the

25 company? 14:50:37

1	A	No, I was not at her goodbye party.	14:50:38
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2 Q Are you aware of anyone giving her these
3 as a gift at a going away party?

4 A I was totally unaware of that, no.

5 Q Okay. And -- and you were never present 14:50:51
6 in any of those meetings?

7 | A The party I was not, no.

8 Q You're familiar she left the company?

9	A	Yeah.
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10 Q Up until today were you aware that Ms. Oz 14:50:58
11 actually had earrings that were the two printed
12 circuit boards of the GBr [REDACTED]

13 A No, I just discovered it today. You just
14 told me, basically.

15 Q And [REDACTED] 14:51:12

16 Do you know what the difference is between

18 A The exact differences, no. I mean, it's
19 like, a small improvement, better version, hence the
20 different in the output. 14:51:31

21 Q But these ones would have [REDACTED]

22 [REDACTED], right?

23 A It actually doesn't because it doesn't
24 have diodes on it. This is just bare PCB.

25	Q	It would just have the PCB?	14:51:39
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1 A Yeah, this is just bare PCB. 14:51:40

2 Q Now, when I look at those, can I tell that

3 there are [REDACTED] on it?

4 A Actually, let me rephrase what I just

5 said. This one doesn't have diodes. The left one 14:51:49

6 does have diodes.

7 Q But you can actually see them on there,

8 right?

9 A Yeah. Can I see?

10 Q This is the [REDACTED] version, correct? 14:51:56

11 A Corrected. Yes. It does have lasers.

12 Q And it also has [REDACTED],

13 right?

14 A Yes, I couldn't tell you if they're --

15 what size they are, what -- 14:52:18

16 Q Do you know if the size for [REDACTED]

17 [REDACTED] changed from GBr2 to GBr3?

18 A I am not sure. I don't know. That I

19 don't know. I know that [REDACTED]

20 changed a little bit. So it's possible that they 14:52:30

21 changed the --

22 Q Would you be concerned at all that someone

23 gave these to Ms. Oz as a gift when she was leaving

24 her employment --

25 A Yeah. 14:52:42

1 Q -- with Google? 14:52:42

2 A Yes.

3 Q Why?

4 A Because this is -- this is confidential

5 information. This is our designs. That's not 14:52:47

6 something we should give to someone, especially if

7 someone is leaving the company.

8 Q Would it surprise you that these earrings

9 were given to her on the Google facilities as a gift

10 before she left? 14:53:00

11 MR. JAFFE: Object to form.

12 THE WITNESS: So let me put it this way:

13 It would surprise me. If Anthony had done this, it

14 would surprise me less, but that's more just from my

15 knowledge of what -- 14:53:16

16 BY MR. CHATTERJEE:

17 Q If he hadn't given it to her but someone

18 else had, would that surprise you?

19 A It would, yes, probably.

20 Q Where does Ms. Oz work now? 14:53:27

21 A I'm not sure. I know she was even like --

22 when she left Google, she was getting pretty -- an

23 executive role, maybe CEO of some -- I don't know

24 exactly -- I didn't know Seval that well.

25 Q Do you know if she's working on 14:53:45

1 self-driving car technologies? 14:53:47

2 A I don't -- I don't know if she is.

3 Q Okay. I can take the earrings back.

4 A Sure.

5 MR. CHATTERJEE: We'll make them available 14:53:55

6 for inspection whenever you want, Jordan. We'll

7 keep the pictures of the record just so it's clear

8 what it was.

9 THE WITNESS: Sorry.

10 MR. JAFFE: Thank you. 14:54:05

11 BY MR. CHATTERJEE:

12 Q Are you aware --

13 A I'm sorry.

14 Q No. You can hold on to that.

15 Are you aware of any vendors publishing 14:54:12

16 pictures of printed circuit boards made --

17 A I mean of our circuit boards?

18 Q Let me ask it more precisely. That's a

19 fair point.

20 Are you aware of any vendors publishing 14:54:27

21 pictures of the printed circuit boards or designs of

22 Google?

23 MR. JAFFE: Object to form.

24 BY MR. CHATTERJEE:

25 Q For LiDAR devices? 14:54:36

1 MR. JAFFE: Same objection. 14:54:36

2 THE WITNESS: I'm not aware of that.

3 BY MR. CHATTERJEE:

4 Q You're not aware of any instance where a

5 picture of a Google printed circuit board for LiDAR 14:54:41

6 was published in a catalog?

7 A A picture of -- no.

8 Q Do you know why Anthony Levandowski was

9 not sued for trade secret misappropriation?

10 MR. JAFFE: Object to form. And 14:55:12

11 objection. Beyond the scope.

12 What topic are we on here?

13 MR. CHATTERJEE: "All measures taken by

14 Google and/or Waymo to protect trade secrets Waymo

15 claims was misappropriated by Otto Trucking." 14:55:21

16 Whether you sued him or not and why falls within

17 that.

18 MR. JAFFE: That is not a question for a

19 fact witness. Is -- that is not within the scope --

20 MR. CHATTERJEE: He's a 30(b)(6) witness. 14:55:30

21 He can answer it. If he doesn't know, he can say he

22 doesn't know.

23 MR. JAFFE: Objection. Beyond the scope.

24 And I'm going to object to form.

25 THE WITNESS: I don't know why. 14:55:38

1 MR. JAFFE: Oh, and -- I don't think it's 14:55:40
2 problematic given your answer, but I also just want
3 to caution you not to reveal any attorney-client
4 communications.

5 BY MR. CHATTERJEE: 14:55:48

6 Q Do you know if Google does anything to
7 ensure compliance by vendors with respect to
8 Google's confidential information associated with
9 its printed circuit boards?

10 MR. JAFFE: Objection. Beyond the scope. 14:56:01

11 THE WITNESS: So I know that we -- you
12 know, from a -- from talking with Tim Willis and
13 seeing how the DSM team works, I know they do
14 inspect the counter facilities. I think one of the
15 thing they check is how the information there is 14:56:17
16 segmented into -- between different projects. I
17 know we have NDAs put in place with vendors and, you
18 know, subcontractors as well.

19 BY MR. CHATTERJEE:

20 Q Do you know if they do any proactive 14:56:33
21 monitoring to make sure that vendors aren't using
22 the information incorrectly?

23 MR. JAFFE: Objection. Beyond the scope.
24 Form.

25 THE WITNESS: I know we do site visits. 14:56:42

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